



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue
Seattle, WA 98101

16 August 2004

DRAFT

Reply To
Attn Of: OCE-084

Mr. Timothy M. Clancy, Supervisor
King County Property Services Division
500 King County Administration Building
500 Fourth Avenue
Seattle, WA 98014

Ms. Debbie Colburn, Director
Surrydowns Children's Center
609 112th Avenue S.E.
Bellevue, WA 98004

Re: Polychlorinated Bi-Phenyl (PCB) Remediation at
Surrydowns Children's Center
Self-Implementing Remediation Under 40 CFR § 761.61(a)

Dear Mr. Clancy & Ms. Colburn:

We appreciated the opportunity to meet with you and your staff at the United States Environmental Protection Offices on August 17, 2004. As we discussed in the August 17, 2004 meeting, it is our understanding that the King County and the Surrydown's Children's Center will be submitting a Remediation Plan for the Surrydowns Children Center to address the remediation of the polychlorinated bi-phenyl (PCB) waste which resulted from the potential improper disposal from leaking flourescent light ballasts in several rooms in the Surrydowns Children's Center.

The King County and Surrydowns Childrens Center are required to submit the PCB remediation Plan under the self-implementing portion of the PCB remediation requirements at 40 CFR § 761.61(a). Since time is of the essence, the United States Environmental Protection Agency requests that King County and Surrydowns Children's Center the submit this plan no later than August 18, 2004.

To assist you in the preparation of this PCB Remediation Plan we have enclosed a copy of the all requirements under 40 CFR §§ 761.61(a)(1)-(9). Our preliminary analyses of the PCB concentrations at the Surrydowns Children's Center indicated that the PCB concentrations ranged from 1,000 parts per million (ppm) to up to 750,000 ppm. Any PCBs at or above 50 ppm are regulated under 40 CFR Part 761. Our preliminary assessment of required PCB remediation under the self-implementing requirements of 40 CFR § 761.61(a) indicates that the PCB must be remediated to 1 ppm and 10ug/100cm² at both the Surrydowns Children's Center which meet the

definition of a High Occupancy Area (HOA) under 40 CFR § 761.3.

If any additional information is required, please contact Daniel Duncan, Regional PCB Program Manager, Office of Waste & Chemicals Management, 1200 Sixth Avenue (WCM-128), Seattle, Washington. He can be reached at (206) 553-6693. In addition if you have any PCB sampling questions please contact Mr. Roy Araki, Quality Assurance Manager of our Office of Environmental Assessment on (206) 553-1193.

Sincerely,

Scott E. Downey, Manager
Pesticides and Toxics Unit

cc: Linda Young, Director, Surrydowns Children's Center

bcc: Tom Eaton, WOO
Mike Bussell, OCE

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

8/17/04

of pages ▶ ~~23~~ ¹⁰⁰ 3

To ~~TIM CLANCY~~
~~TIM DUNN~~ ^{8/17/04}

From DAN DUNCAN

Dept./Agency KING COUNTY

Phone # (206) 553-4693

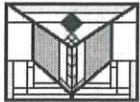
Fax # (206) 296-0514

Fax # (206) 553-8509

NSN 7540-01-317-7368

5099-101

GENERAL SERVICES ADMINISTRATION



Bill Dunbar

08/17/2004 04:28 PM

To: Daniel Duncan/R10/USEPA/US@EPA, Scott
Downey/R10/USEPA/US@EPA, Mike Bussell/R10/USEPA/US@EPA,
Philip Wong/R10/USEPA/US@EPA

cc:

Subject: final copy of child care letter1

Bill Dunbar
Public Affairs Specialist
EPA Region 10
206/553-1203

----- Forwarded by Bill Dunbar/R10/USEPA/US on 08/17/2004 04:28 PM -----



"Amos, Linda"
<Linda.Amos@METRO
KC.GOV>

08/17/2004 03:36 PM

To: Richard Kauffman/R10/USEPA/US@EPA, Bill
Dunbar/R10/USEPA/US@EPA

cc: "Kraft, Elaine" <Elaine.Kraft@METROKC.GOV>, "Karasz-Dominguez,
Hilary" <Hilary.Karasz-Dominguez@METROKC.GOV>, "Ing, Jeff"
<Jeff.Ing@METROKC.GOV>

Subject: final copy of child care letter1

Hi Richard and Bill,
Here is the final copy of the letter we're sending out to parents at Surreydowns. Thank you so much for
your help, and Dr. Larson's.

Hilary Karasz-Dominguez
Public Health - Seattle & King County



206-296-4767 <<PCB-childcare letter.doc>> PCB-childcare letter.do



Public Health

Seattle & King County

HEALTHY PEOPLE. HEALTHY COMMUNITIES.

Alonzo L. Plough, Ph.D., MPH, Director and Health Officer

August 17, 2004

Dear Parent or Guardian,

As you may know, Surreydowns Children's Center will be temporarily closed because preliminary results of tests of light fixtures showed the presence of PCBs (Polychlorinated Biphenyls). Though I do not believe your child was exposed to a dangerous level of PCBs in the Surreydowns Children's Center, I do believe it is responsible to be very cautious when dealing with these chemicals. I support temporarily closing the facility while the fixtures are replaced because it makes sense to limit the amount of chemicals to which we expose our children.

Although PCBs were banned over 25 years ago, they are still in our environment, because they do not biodegrade. PCBs are very common in our environment. We all likely have some PCBs in our bodies from many different sources. One common route for us to be exposed to PCBs is through the fish we eat. Scientists who studied PCBs found health problems, including rashes and liver damage, in people who had long-term exposure due to working in industries that used a lot of PCBs. Members of the general population are not generally at risk, but pregnant women should avoid contact with PCBs, though enough exposure to cause health problems for pregnant women in this instance is unlikely.

If you are concerned, you may want to discuss your child's potential exposure with your child's health provider. If your child does not have a health care provider, Public Health's Eastgate Clinic has staff you may take your child to visit. Eastgate Clinic's telephone number is 206-296-4920.

If you have questions about the childcare facility closure, contact Trudi Atchison at the Washington Department of Social and Health Services at 425-649-4314.

There are many resources to learn more about PCBs and about the closure of this child care facility. One place to start is at <http://www.atsdr.cdc.gov/tfacts17.html>. You may also contact the Agency for Toxic Substances and Disease Registry's Dr. Karen Larson at 206-553-6978. Finally, a copy of this letter may be found at <http://www.metrokc.gov/health/pcb>

Sincerely,

Dr. Alonzo Plough, Director and Health Officer, Public Health – Seattle & King County

Office of the Director

999 Third Avenue, Suite 1200 • Seattle, WA 98104-4039

T (206) 296-4600 F (206) 296-0166 • www.metrokc.gov/health



City of Seattle
Gregory J. Nickels, Mayor



King County
Ron Sims, Executive



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

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Seattle, WA 98101

Reply to
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AUG 19 2004

Mr. Timothy M. Clancy, Supervisor
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Seattle, WA 98014

Ms. Debbie Colburn, Director
Surrydowns Children's Center
609 112th Avenue S.E.
Bellevue, WA 98004

Re: Polychlorinated Bi-Phenyl (PCB) Remediation at Surrydowns Children's Center

Dear Mr. Clancy & Ms. Colburn:

On August 17, 2004, the U.S. Environmental Protection Agency (EPA) met with the King County Property Services Division and other County officials to discuss our recent inspection of the Surrydowns Children's Center. As we discussed, PCB waste has apparently leaked from many fluorescent light ballasts in the building. Based on our preliminary analyses of the samples we took, it appears that this material contains PCBs in concentrations ranging from 10,000 parts per million (ppm) up to 750,000 ppm. PCBs at or above 50 ppm are regulated under the Toxic Substances Control Act (TSCA), and the regulations implementing TSCA in 40 Code of Federal Regulations (CFR) Part 761.

We understand from our discussions that King County, in coordination with the Surrydown's Children's Center, intends to remediate the spills according to the procedures entitled "Self-implementing on-site cleanup and disposal of PCB remediation waste" in 40 CFR § 761.61(a). Under this section, a facility meeting the definition of a High Occupancy Area under 40 CFR § 761.3 must remediate to 1 ppm and 10ug/100cm². The regulations also state that cleanup cannot begin until at least 30 days after a PCB Remediation Plan is submitted to EPA, unless EPA approves the plan sooner. However, I think we all agree that remediation should take place as soon as possible. Therefore, we request that you submit the Plan to us no later than August 24, 2004; we in turn will expedite the approval process so the cleanup can begin right away.

It is important to note that satisfactory completion of the remediation does not preclude EPA from bringing a subsequent enforcement action for any past or future violations of TSCA, or any other applicable legal requirements.

To assist you in the remediation effort, we have enclosed a copy of the relevant regulatory provisions in 40 CFR § 761.61(a)(1)-(9). If you need additional information, please contact Daniel Duncan, PCB Program Team Leader, at (206) 553-6693. If you have any PCB sampling questions, you should contact Roy Araki, Quality Assurance Manager in our Office of Environmental Assessment, at (206) 553-1193.

Sincerely,



Scott E. Downey, Manager
Pesticides and Toxics Unit

Enclosure

cc: Linda Young, Director, Surrydowns Children's Center